

November 23, 2005

**THIS IS NOT AN OFFICIAL STATEMENT OF  
THE COURT, BUT IS INTENDED SOLELY  
FOR THE CONVENIENCE OF THE PRESS**

**FOR IMMEDIATE RELEASE**

---

---

**IN THE SUPREME COURT OF THE STATE OF IDAHO  
2005 Opinion No. 115**

**WOODLAND FURNITURE, LLC, an )  
Idaho limited liability company, )**

**Plaintiff-Counterdefendant- )  
Appellant, )**

**v. )**

**Docket No. 30977**

**RICHARD LARSEN and HEIRLOOM )  
REFLECTIONS, LLC, an Idaho limited )  
liability company, )**

**Defendants-Counterclaimants- )  
Respondents. )**

---

Appeal from the District Court of the Seventh Judicial District of the State of Idaho, Jefferson County. Hon. Brent J. Moss, District Judge.

The district court's orders dismissing Appellant's claims based on the Lanham Act, common law unfair competition, and statutory unfair competition are affirmed.

Beard, St. Clair, Gaffney, McNamara & Calder, PA, Idaho Falls, for appellant. Michael D. Gaffney argued.

Law Office of Duncan Palmatier, Moscow, for respondents. Duncan Palmatier argued.

---

In a unanimous decision, the Idaho Supreme Court affirmed the district court's orders dismissing Woodland Furniture's claims based on the Lanham Act, common law unfair competition, and statutory unfair competition.

Woodland manufactures furniture using various processes to achieve a particular "distressed" or aged look. Richard Larsen was an employee of Woodland and was familiar with its manufacturing processes. Upon leaving Woodland's employ, Larsen formed Heirloom Reflections and began manufacturing furniture that replicated Woodland's look.

Woodland discovered Heirloom's conduct and filed suit. On summary judgment, the district court dismissed Woodland's federal trade dress infringement claim, finding Woodland had failed to articulate specific features that distinguish its furniture. Shortly thereafter, the district court dismissed Woodland's remaining two claims relating to unfair competition. Woodland appealed.

The Supreme Court affirmed the district court's grant of summary judgment relating to Woodland's Lanham Act claims because Woodland failed to articulate with specificity the elements of its claimed trade dress and because the features Woodland sought to protect were deemed functional. Likewise, the Supreme Court concluded Woodland's common law unfair competition claim was appropriately dismissed because federal patent law preemption precludes such protection for functional features. Finally, the Supreme Court affirmed the district court's grant of summary judgment on Woodland's statutory unfair competition claim because there was nothing more than a "mere scintilla" of evidence showing Heirloom acted with the purpose of driving Woodland out of business.